



**Snohomish County**  
Public Works  
Surface Water Management

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OCT 05 2005

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September 30, 2005

Bill Moore  
Water Quality Program  
Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

Subject: Snohomish County Comments On Proposed Annual Report Form For  
NPDES Phase 1 Municipal Stormwater Permit

Dear Mr. Moore,

Thank you for the opportunity to comment on the proposed annual report form for the next NPDES Phase 1 municipal stormwater permit.

In general, we think that the annual report form is good in both concept and execution. It will reduce resources needed for both report preparation and Ecology review. It will also provide more certainty to a permittee that the annual report submitted will be considered 'adequate' by Ecology, and should reduce the time that might be needed for additional discussions or data submittals.

The following page contains some suggestions that we think will improve the report form. If you would like to discuss these suggestions further, please contact Bill Leif at (425) 388-3148.

Sincerely,

Joan M. Lee, P.E.  
Director, Surface Water Management Division

cc: Tom Fitzpatrick, Executive Director  
Peter Hahn, Public Works Director  
Craig Ladiser, Planning and Development Services Director  
Joan M. Lee, Surface Water Management Division Director  
Bill Leif, Water and Habitat Sciences, Section Supervisor



Part 2, Section 1.D – Program Administration

We recommend removing Table 1, which asks for the number of individuals responsible for implementing the Stormwater Management Program (SWMP), for the following reasons:

1. “number of individuals responsible for implementation” is not a parameter that is required by any of the SWMP elements in the permit;
2. this parameter will not be a performance metric that we will propose in our SWMP for most of our programs
3. in many cases, this parameter would be difficult to calculate, or involve many assumptions, or both;
4. comparative levels of performance are not well indicated by variations in this parameter among permittees, or changes for a given permittee through different years.

Most of the rest of the form is based directly on the explicit performance requirements set forth in the permit, and we think such an approach is the best one.

Part 2, Section 1.F – Expenditures

In our previously-submitted comments on the preliminary draft NPDES Phase 1 municipal stormwater permit, we essentially recommended against requiring separate actions for TMDL implementation, such as additional Quality Assurance Plans for monitoring. In keeping with this requirement, we recommend deleting the line for “S5. TMDL implementation” in Table 2. Actions in a TMDL Detailed Implementation Plan can be manifest in an NPDES permit either by reissuing the permit or modifying it. In either case, the actions would be contained in a section of the permit, e.g., monitoring, and implementation thus would be tracked via the metrics attached to that permit element. Having a separate line for TMDL implementation would lead to double-counting of resources.

Part 2, Section 2 – Reporting Requirements related to SWMP Implementation

There were a number of inaccurate references to permit sections, such as “S.7.7.b.iii” instead of “S.7.C.7.b.iii.” We assume that these will be corrected in the next draft.